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Attorneys for Defendant *Liberty Mutual Fire Insurance Company*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AIG SPECIALTY INSURANCE COMPANY  
F/K/A CHARTIS SPECIALTY INSURANCE  
COMPANY AND ALSO AMERICAN  
INTERNATIONAL SPECIALTY LINES  
INSURANCE COMPANY, an Illinois  
Corporation;

Plaintiffs,

vs.

LIBERTY MUTUAL FIRE INSURANCE  
COMPANY, a Massachusetts Corporation; and  
DOES 1 through 100, inclusive,

Defendants.

Case No.: 2:17-cv-01260-APG-NJK

**STIPULATION AND ORDER  
EXTENDING TIME FOR BRIEFING ON  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT [ECF NO. 77]**

**(FIRST REQUEST)**

Plaintiff, AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS SPECIALTY INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY ("Plaintiff"), and Defendant, LIBERTY MUTUAL FIRE INSURANCE COMPANY ("Defendant" and collectively, with Plaintiff the "Parties"), by and through their respective counsel of record, and pursuant to Local Rules 6-1(a) and 6-2, and Federal Rule of Civil Procedure Rule 6, hereby stipulate and agree as follows:

WHEREAS, on November 27, 2017, Defendant filed a Motion for Summary Judgment (ECF No. 77);

WHEREAS, on December 18, 2017, Plaintiff filed its Opposition to Defendant's Motion for Summary Judgment (ECF No. 89), and Declaration of Josh Zlotlow in Support of Motion for Summary Judgment (ECF No. 90);

1 WHEREAS, Defendant's Reply in Support of Defendant's Motion for Summary Judgment,  
2 if any, is currently due January 2, 2018;

3 WHEREAS, Defendant's counsel requested, on the basis of the holidays and because the  
4 undersigned Defendant's counsel came down with the flu, a short extension of one-week to file  
5 Defendant's Reply; and

6 WHEREAS, Plaintiff's counsel graciously extended a one-week extension, extending the  
7 deadline for Defendant to file a Reply in Support of its Motion for Summary Judgment from January  
8 2, 2018 to **January 9, 2018**; and

9 WHEREAS, Fed.R.Civ.P. 6(b) requires the Court to approve an extension of time, and  
10 therefore the Parties collectively request the Court approve the stipulation, as set forth below:

- 11 a. This is the Parties' first stipulation for an enlargement of time;
- 12 b. The Parties stipulate and agree that the deadline for Defendant to file a Reply in  
13 Support of Defendant's Motion for Summary Judgment (ECF No. 77) shall be extended to **January**  
14 **9, 2018**; and

15 c. This stipulation is not made for purposes of delay.

16 IT IS SO STIPULATED.

17 **DUANE MORRIS LLP**

**HEROLD & SAGER**

18  
19 By: /s/ Daniel B. Heidtke  
Dominica C. Anderson (SBN 2988)  
Daniel B. Heidtke (SBN 12975)

By: /s/ Joshua A. Zlotlow  
Andrew D. Herold (SBN 7378)  
Joshua A. Zlotlow (SBN 11333)  
Attorneys for Plaintiff *AIG Specialty Insurance*  
*Co. f/k/a Chartis Specialty Insurance Co. and*  
*also American International Specialty Lines*  
*Insurance Co.*

20  
21 Attorneys for Defendant *Liberty Mutual Fire*  
*Insurance Company*

22  
23 **IT IS SO ORDERED** this 27th day of December, 2017.

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27 \_\_\_\_\_  
U.S. DISTRICT JUDGE